

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA, <i>ex rel.</i> ,	:	
STEVEN F. COLLIER,	:	CASE NO. 1:00cv-825
	:	(Judge Beckwith)
PLAINTIFF,	:	(Magistrate-Judge Hogan)
	:	AMENDED
v.	:	STIPULATED MOTION FOR
	:	COURT APPROVAL OF
FLUOR CORPORATION	:	THE SETTLEMENT AND
d/b/a FLUOR FERNALD, INC.,	:	DISMISSAL
	:	
DEFENDANT.	:	

Plaintiff/Relator Collier and Defendant Fluor Fernald Corporation move this Court to approve the settlement of the above-captioned matter, which has the approval of the United States of America. Upon Court approval, Relator respectfully requests the Court to dismiss his action with prejudice. The bases of this motion are more fully set forth in the attached memorandum and attached Settlement Agreement.

Respectfully submitted,

/s/Glenn Whitaker
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MEMORANDUM

Relator Steven Collier filed his original action under seal on September 27, 2000. On November 27, 2001, the United States notified the Court of its declination of intervention. Following a bankruptcy filing by one of the two defendants (The IT Group), Relator Collier moved to stay the litigation. Upon dismissal of The IT Group as a party, Relator Collier, through counsel, moved the Court to reinstate his action, filing an Amended Complaint. On October 20, 2003, Defendant Fluor Corporation filed its motion to dismiss, to which Relator Collier responded. On August 19, 2004, this Court issued its Memorandum and Order, among other things, allowing Relator Collier until August 27, 2004 to file a Second Amended Complaint. Because the parties were actively engaged in settlement negotiations, Relator Collier requested additional time to file its Second Amended Complaint, until September 30. The Court granted Relator's motion.

The parties have settled this matter. The United States of America has approved the settlement. The parties respectfully request that this Court issue an order approving the settlement between the parties. Upon the Court's approval, Relator Collier will dismiss his action with prejudice. Attached hereto is the executed Settlement Agreement of the parties. Upon Court approval, Relator respectfully requests this Court to dismiss his action with prejudice. Attached is a proposed dismissal.

Respectfully submitted,

/s/Glenn Whitaker

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I hereby certify that on September 21, 2004, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system *which will send notification of such filing to the following*: and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

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